

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

<b>Quinda Beeson,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. CIV-20-327-SLP</b>
	)	
<b>Safeco Insurance Company of America,</b>	)	
	)	
<b>Defendant.</b>	)	

---

**PLAINTIFF’S UNOPPOSED MOTION TO  
PLACE CERTAIN COURT FILING UNDER SEAL**

---

COMES NOW Plaintiff Quinda Beeson and moves the Court for an immediate order placing Exhibit 1 to *Plaintiff’s Objection to Defendant’s Proposed Jury Instructions*, filed February 8, 2022, Doc. 118 (“Plaintiff’s Objection”) under seal. In support of this Motion, Plaintiff states as follows:

1. Plaintiff’s Objection was filed on February 8, 2022. [Doc. 118]. Filed with Plaintiff’s Objection were two (2) exhibits. One of the two exhibits, exhibit 2, was filed under seal.

2. On February 18, 2022, Plaintiff received a letter from defense counsel designating certain deposition transcript pages from the deposition of Diana Fox as **CONFIDENTIAL** in accordance with the parties Agreed Protective Order entered by this court on June 26, 2020. [Doc. 15].

3. Exhibit 1 to Plaintiff’s Objection includes transcript pages which were designated as **CONFIDENTIAL** within the February 18, 2022 letter.

4. Plaintiff's counsel has conferred with defense counsel and they have no objection to the filing of this Motion.

5. Pursuant to the parties Agreed Protective Order, Plaintiff asks the court to enter an immediate Order placing Exhibit 1 to *Plaintiff's Objection to Defendant's Proposed Jury Instructions*, filed February 8, 2022, Doc. 118, under seal.

Respectfully submitted,

/s/Jacob L. Rowe

Jacob L. Rowe, OBA #21797

Madison Botizan, OBA No. 34615

FULMER SILL PLLC

1101 N. Broadway Ext., Suite 102

Oklahoma City, OK 73103

Phone: (405) 510-0077

Fax: (800) 978-1345

Email: [jrowe@fulmersill.com](mailto:jrowe@fulmersill.com)

[mbotizan@fulmersill.com](mailto:mbotizan@fulmersill.com)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of August, 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

William W. O'Connor  
Margo E. Shipley  
320 S. Boston Ave., Suite 200  
Tulsa, OK 74103  
[boconnor@hallestill.com](mailto:boconnor@hallestill.com)  
[mshipley@hallestill.com](mailto:mshipley@hallestill.com)

/s/Jacob L. Rowe